

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Nigel Bruce Giovanni Jackson

Case No. **1:22-MJ-00160**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2021 to March 10, 2022 in the county of Hamilton in the
Southern District of Ohio, the defendant(s) violated:

Code Section

21 U.S.C. 846 and 841(a)(1)

18 U.S.C. 922(g)(1)

Offense Description

Possession with Intent to Distribute a Controlled Substance;

Felon in Possession of a Firearm.

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.

Robert J. Dreske

Complainant's signature

TFO Robert J. Dreske, DEA

Printed name and title

Sworn to before me and signed in my presence.
via electronic means, specifically Facetime video.

Date: Mar 10, 2022

City and state: Cincinnati, Ohio

Stephanie K. Bowman

Judge's signature

Hon. Stephanie K. Bowman, U.S. Magistrate Judge

Printed name and title



**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

I, Robert J. Dreske, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. Beginning in or about November 2021, the exact dates being unknown, and continuing through March 10 2022, **Timothy WHITAKER, Nigel JACKSON, Kenneth ENGLISH, Gary JONES and Shaun ARMSTRONG-HAND**, in the Southern District of Ohio and elsewhere, knowingly and intentionally combined, conspired, confederated and agreed together and with each other, to commit the following offense(s) against the United States: to possess with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A), in violation of Title 21 U.S.C. § 846.

2. I am a Deputy Sheriff, and have been employed so since January of 2017. I am employed by the Butler County Sheriff's Office, located in Butler County, Ohio. I have been assigned as a narcotics agent to the Butler County Undercover Regional Narcotics (BURN) Task Force since November of 2018. I am currently assigned as a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA) and have been since June of 2021. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1). I earned a Bachelor's of Public Administration Degree and graduated from Miami University as well as the Ohio Peace Officer Training Academy (OPOTA). During the course of my law enforcement career, I have received hundreds of hours in various drug trainings, in addition to training in the use, preparation, and execution of search and seizure

warrants through OPOTA. As a DEA TFO, my duties and responsibilities include conducting criminal investigations for violations of federal law, particularly those found in Title 21 and Title 18 of the United States Code. During my tenure with the DEA, I have participated in several criminal investigations seeking evidence of violations of the Controlled Substances Act (Title 21, of the United States Code).

3. As a DEA Task Force Officer, I have participated in all aspects of drug investigations, including physical surveillance, installation and monitoring of GPS devices, execution of search warrants, arrests of drug traffickers, and Title-III wiretap investigations. I have participated in the execution of numerous search warrants seeking evidence of violations of the Federal Controlled Substances Act (Title 21 of the United States Code). These warrants covered the search of locations such as residences of drug traffickers and their co-conspirators/associates, drug manufacturing operations, and stash houses used as storage and distribution points for controlled substances. I have also participated in the execution of search warrants for electronic devices and information, such as search warrants for e-mail accounts, mobile telephones, and GPS tracking devices.

4. By virtue of my involvement in these investigations, I have become familiar with the various means and mechanisms used by drug traffickers to import and distribute controlled substances and to remain at large without being detected by law enforcement. I am familiar with the fact that drug traffickers make tremendous profits through drug trafficking, and require large amounts of currency to operate surreptitiously. In this regard, I have obtained and executed numerous search warrants in which I have seized ledgers, notebooks, papers, and other related record-keeping instruments, all of which have been used to record multiple narcotics and related money laundering transactions. I have also seized telephone books, diaries, invoices, cellular

telephones, and correspondence that contained evidence of narcotic trafficking and money laundering violations.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the complaint and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

6. Since November of 2021, agents of the DEA Cincinnati District Office and other law enforcement agencies have been investigating a methamphetamine Drug Trafficking Organization (DTO) operating in the Cincinnati, Ohio area.

7. In November and December of 2021, agents conducted multiple undercover controlled purchases of methamphetamine from Timothy WHITAKER; during those controlled purchases agents identified Nigel JACKSON and Kenneth ENGLISH as WHITAKER's sources of supply of methamphetamine.

8. During the course of this investigation, law enforcement has conducted extensive surveillance, to include physical and electronic surveillance, in which the following individuals have been identified as conspiring to distribute and to possess with intent to distribute more than 50 grams of methamphetamine: **Timothy WHITAKER, Nigel JACKSON, Kenneth ENGLISH, Gary JONES, Shaun ARMSTRONG-HAND.**

9. During the course of this investigation, law enforcement identified the following residences involved with the DTO:

- a. 2135 Trapp Court, Cincinnati, Ohio 45231 (**SUBJECT PREMISES A1**). This is the home of Nigel JACKSON and Shaun ARMSTRONG-HAND; this residence is utilized as a stash location for narcotics.
- b. 4603 Lakes Edge, Apt. 2, West Chester, Ohio 45069 (**SUBJECT PREMISES A2**). This is the home of Kenneth ENGLISH.
- c. 3821 Boudinot Avenue, Apt. 2, Cincinnati, Ohio 45211 (**SUBJECT PREMISES A3**). This is the home of Gary JONES.
- d. 1845 Sevenhills Drive, Cincinnati, Ohio 45231 (**SUBJECT PREMISES A4**). This is a stash location for narcotics.
- e. 1234 Omniplex Dr, Room 411, Cincinnati, Ohio 45240 (**SUBJECT PREMISES A5**). This is the residence of Timothy WHITAKER.

10. On March 7, 2022, the Honorable Stephanie K. Bowman, United States Magistrate Judge for the Southern District of Ohio, signed and authorized a federal search warrant under case number 1:22-MJ-00136 which authorized the search of 4603 Lakes Edge, Apartment #2, West Chester, Ohio 45069. This search warrant established probable cause to believe that Kenneth ENGLISH used this residence to traffic methamphetamine.

11. On March 10, 2022, the Drug Enforcement Administration (DEA) executed federal search at 4603 Lakes Edge, Apartment #2, West Chester, Ohio 45069, a residence I believe ENGLISH used to facilitate his drug trafficking activities.

12. During the execution of the search warrant at 4603 lakes Edge, Apartment #2, West Chester, Ohio 45069, agents seized evidentiary items that include one (1) magazine loaded with 9mm ammunition; one (1) magazine (drum) loaded with 9mm ammunition; one (1) Glock 45 9mm handgun containing a chambered round with a magazine inserted, with a serial number of

BPHV344; one (1) Freedom Ordinance FX9 rifle containing a chambered round with no magazine with serial number 044396; one (1) clear Ziploc style bag containing suspected marijuana; one (1) vacuum sealed bag containing crystal methamphetamine; one (1) digital scale containing residue; one (1) magic blender cup containing white powder residue; one (1) manual pill press; and one (1) money counter. The loaded Glock 45 was located by the bed in the master bedroom. The loaded Freedom Ordinance rifle was located in the master bedroom closet.

13. Based on my training and experience, I believe that the amount of suspected methamphetamine agents seized from 4603 Lakes Edge, Apartment #2, West Chester, Ohio is not consistent with personal use, and is instead a trafficking amount. The money counter, manual drug press, supports my belief that the methamphetamine was intended for sale and not for ENGLISH's personal consumption.

14. On March 7, 2022, the Honorable Stephanie K. Bowman, United States Magistrate Judge for the Southern District of Ohio, signed and authorized a federal search warrant under case number 1:22-MJ-00135 which authorized the search of 2135 Trapp Court, Cincinnati, Ohio 45231. This search warrant established probable cause to believe that Nigel JACKSON and Shaun ARMSTRONG-HAND used this residence to traffic methamphetamine.

15. On March 10, 2022, the Drug Enforcement Administration (DEA) executed federal search at 2135 Trapp Court, Cincinnati, Ohio 45231, a residence I believe JACKSON and ARMSTRONG-HAND used to facilitate his drug trafficking activities.

16. During the execution of the search warrant at 2135 Trapp Court, Cincinnati, Ohio 45231, agents seized evidentiary items that include one (1) Ruger LC9 9mm pistol containing one chambered round with a loaded magazine inserted, with a serial number of 326-06796; one (1) grocery bag containing crystal methamphetamine with a gross weight of approximately 276 grams;

one (1) clear bag containing crystal methamphetamine with a gross weight of approximately 149 grams; three (3) digital scale containing residue; one (1) plastic bag containing several individually packaged bags of crystal methamphetamine; one (1) magic blender cup containing white powder residue; one (1) United States Postal Service box containing packaging heat sealed bags consistent with one to two pound methamphetamine packages.

17. Based on my training and experience, I believe that the amount of suspected methamphetamine agents seized from 2135 Trapp Court, Cincinnati, Ohio 45231 is not consistent with personal use, and is instead a trafficking amount. The blender containing residue and digital scales, support my belief that the methamphetamine was intended for sale and not for JACKSON's personal consumption.

18. On March 7, 2022, the Honorable Stephanie K. Bowman, United States Magistrate Judge for the Southern District of Ohio, signed and authorized a federal search warrant under case number 1:22-MJ-00137 which authorized the search of 3821 Boudinot Avenue, Apt. 2, Cincinnati, Ohio 45211. This search warrant established probable cause to believe that Gary JONES used this residence to traffic methamphetamine.

19. On March 10, 2022, the Drug Enforcement Administration (DEA) executed federal search at 3821 Boudinot Avenue, Apt. 2, Cincinnati, Ohio 45211, a residence I believe JONES used to facilitate his drug trafficking activities.

20. JONES has a prior felony conviction for Improperly Handling a Firearm in a Motor Vehicle from 2019.

21. During the execution of the search warrant at 3821 Boudinot Avenue, Apt. 2, Cincinnati, Ohio 45211, agents seized evidentiary items that include one (1) Polymer P80 9mm – Serial Number CA38589 – no round in chamber, but a full seated magazine.

22. On March 7, 2022, the Honorable Stephanie K. Bowman, United States Magistrate Judge for the Southern District of Ohio, signed and authorized a federal search warrant under case number 1:22-MJ-00139 which authorized the search of 1234 Omniplex Dr, Room 411, Cincinnati, Ohio 45240. This search warrant established probable cause to believe that Timothy WHITAKER used this residence to traffic methamphetamine.

23. On March 10, 2022, the Drug Enforcement Administration (DEA) executed federal search at 1234 Omniplex Dr, Room 411, Cincinnati, Ohio 45240, a residence I believe WHITAKER used to facilitate his drug trafficking activities.

24. During the execution of the search warrant at 1234 Omniplex Dr, Room 411, Cincinnati, Ohio 45240, agents seized evidentiary items that include crystal methamphetamine located on a tray in the room (presumptive field test) gross weight of 37.5 grams and two (2) digital scales with residue.

25. Based on my training and experience, I believe that the amount of suspected methamphetamine agents seized from 1234 Omniplex Drive, Room 411, Cincinnati, Ohio 45240 is not consistent with personal use, and is instead a trafficking amount. The undercover purchases from November and December of 2021 and recovery of digital scales, support my belief that the methamphetamine was intended for sale and not for WHITAKER's personal consumption.

CONCLUSION

26. Based on evidence obtained as a result of this investigation, I believe that probable cause exists that beginning in or about November 2021, the exact dates being unknown, and continuing through March 10, 2022, the defendants, **Timothy WHITAKER, Nigel JACKSON, Kenneth ENGLISH, Gary JONES and Shaun ARMSTRONG-HAND**, and others, in the Southern District of Ohio and elsewhere, knowingly and intentionally combined, conspired,

confederated and agreed together and with each other, to commit the following offense(s) against the United States: to possess with the intent to distribute 50 or more grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A), in violation of Title 21 U.S.C. § 846.

Respectfully submitted,

Robert J. Dreske

Robert J. Dreske
Task Force Officer
Drug Enforcement Administration

Subscribed and sworn to before me on this 10th day of March, 2022.
via electronic means, specifically Facetime video.

Stephanie K. Bowman

HONORABLE STEPHANIE K. BOWMAN
UNITED STATES MAGISTRATE JUDGE

